

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Kirkendall Dwyer, LLP and John Doe,) C/A No:
)
Plaintiffs,)
vs.)
The South Carolina Bar Commission on)
Lawyer Conduct, Christopher G. Isgett,)
The South Carolina Office of Disciplinary)
Counsel, John S. Nichols and Alan Wilson,)
South Carolina Attorney General,)
)
Defendants.)

**PLAINTIFFS' LOCAL RULE 26.01
INTERROGATORY ANSWERS**

NOW COMES PLAINTIFFS, by and through counsel, and answers the Local Rule 26.01
Interrogatories as follows:

Interrogatory Answers

(A) State the full name, address, and telephone number of all persons or legal entities
who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER: The actions are causes of action which require the interpretation, construction
and application of the South Carolina Rules of Professional Conduct as it relates to
advertising / promoting law firms in the State of South Carolina. The Complaint seeks
declaratory and injunctive relief, as a result of which the Plaintiffs contend that the matter
should be tried nonjury.**

(C) State whether the party submitting these responses is a publicly owned company
and separately identify: (1) each publicly owned company of which it is a parent, subsidiary,
partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the
outstanding shares or other indicia of ownership of the party; and (3) each publicly owned
company in which the party owns ten percent or more of the outstanding shares.

ANSWER: No.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See Local Civil Rule 3.01.*

ANSWER: The Defendants are located in the district and a substantial part of the events or omissions giving rise to the claim occurred in the district.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Upon information and belief there is no other matter pending within the division.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Not applicable.

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